

IN RE:) Case No.: 16-20226
)
Gale L. Neal and)
Cheryl D. Neal,) Chapter 13
)
Debtors.)
)
Gale L. Neal and)
Cheryl D. Neal,)
) Document #
Movants,)
)
V)
)
RONDA J. WINNECOUR,)
Ch. 13 Trustee,)
)
Respondent.)

MOTION TO INCUR POST-PETITION FINANCING

AND NOW come the Debtors, Gale L. Neal and Cheryl D. Neal, by and through their undersigned counsel, and file the within "Motion to Incur Post-Petition Financing", and in support thereof, avers as follows:

1. The Debtors filed a petition under Chapter 13 of the Bankruptcy Code on January 26, 2016.
2. The Debtors are having ongoing problems with their vehicle husband-debtor relies on to get back and forth to work.
3. Debtor received an Order of Court for Post-Petition financing on July 13, 2016 at docket number 33, however when Debtor presented the Order of Court he was informed that the vehicle was no longer available.
4. The Debtor-husband has reached a tentative agreement Jim Shorkey Mitsubishi for financing totaling \$22,000.00 with an APR not to exceed 21% with no required down payment and the payments are not to exceed \$525.00. (See email dated October 14, 2016 from Susanne Snyder attached hereto and marked as "Exhibit A")
5. The Debtors aver that they need a reliable vehicle as soon as possible, because their current vehicle is no longer working.

WHEREFORE, the Debtors Document Page 2 of 2 request that this Honorable Court enter an Order granting

the post-petition financing agreement in the form attached to this Motion as "Exhibit A", or for financing with any Dealer for \$22,000.00 with payments not to exceed \$525.00 per month and grant such other and further relief as deemed just and proper.

Respectfully submitted,

/s/ Dennis J. Spyra

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